



555 NEW JERSEY AVENUE, N.W.
WASHINGTON, DC 20001-2079
FCC MAIL SECTION

Nov 12 11 05 AM '98

SANDRA FELDMAN
PRESIDENT

EDWARD J. McELROY
SECRETARY-TREASURER

NAT LaCOUR
EXECUTIVE VICE PRESIDENT

DISC 11/10/98
November 10, 1998

RECEIVED

NOV 12 1998

FCC MAIL ROOM

Ms. Margalie Roman Salas, Secretary
Federal Communications Commission
1919 M Street, N. W.
Room 222
Washington, D. C. 20554

Dear Secretary Salas:

Attached are five copies of comments regarding FCC Docket No. 98-170, the Truth-in-Billing proceeding. This submission is from the American Federation of Teachers.

If there are questions regarding it, I may be reached at (202) 393-6370.

Respectfully submitted,

Mary M. Cross, Associate Director
Legislation Department
American Federation of Teachers
555 New Jersey Avenue, N. W.
Washington, D. C. 20001

MMC:cmw (SalasFCC)
Opeiu#2afl-cio

Enclosures

No. of Copies rec'd
List A B C D E

0+4

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D. C. 20554

Nov 12 11 05 AM '98

In the Matter of)

Truth-in-Billing Proceeding)

CC Docket No. 98-170

RECEIVED

NOV 12 1998

COMMENTS OF THE AMERICAN FEDERATION OF TEACHERS

FCC MAIL ROOM

On behalf of its 1,000,000 members who are K-12 teachers and school aides, health care professionals, higher education staff, state employees, and public sector retirees, the American Federation of Teachers (AFT) commends the efforts of the Federal Communications Commission to establish guidance that will ensure greater clarity and truthfulness in billing by telecommunication providers. With the expansion of programs under the Universal Service Fund (USF) that will make services more affordable to schools, libraries and health care facilities, our members will become an even larger proportion of consumers of telecommunications services, and clarity about charges for services is of considerable interest.

The lack of complete, clear and non-misleading information has led to much public confusion about E-Rate program, confusion that is quite similar to that experienced by individual consumers. To address some of these problems, the AFT offers the following suggestions for your consideration, that they be applied, as appropriate, to the billing of individuals and institutional customers —

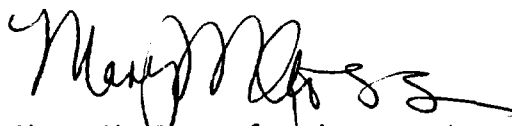
1. All information on bills regarding services should be full and truthful. Clear, non-technical descriptions should be the standard. Information should be laid out so that customers can easily identify the services that are provided, the service providers, costs, and any changes in services or costs that have occurred since the prior billing period. The initiator of any change in service or charge should also be clearly identified (e.g. customer request, carrier decision, government requirement, non-communications service provider, etc.).
2. When a new charge or service is being planned that involves parties other than the company and the consumer being charged, the additional party(s) should be able to review the description of the new service or charge for its accuracy, completeness, and clarity. Prior to the description being distributed to

customers, to the extent appropriate, the company and the third party(s) should attempt to arrive at language that each agrees is accurate, clear and complete. To the extent that a carrier chooses additional mechanisms to disseminate information about changes in service or charges (e.g., an Internet site, a toll free number) third parties should be able to review this information for accuracy, clarity and completeness as well.

3. Regarding individual customers, when carriers plan to increase charges, they should give customers written notice at least two month in advance of the proposed change. The notice of change should be conspicuous and clearly identified on the bill. Provisions for notification of changes on institutional bills should be in contracts and subject to conditions of the contract between the institution and the provider.
4. At least once every six months, companies should provide all customers with a document that reviews their current services, service providers, costs of services, any changes in services or charges that have occurred in the prior six month period--and when such changes have been occurred, who initiated them. This summary should include all charges for communications and non-communications service that appear on customer's bills.
5. The FCC, in collaboration with state and local utility commissions, consumer groups, and stakeholder groups such as businesses and schools should conduct a study to determine how changes in the billing practices that result from this proceeding are implemented and how they affect consumer knowledge and education, satisfaction with billing information and practices, and complaints. Such a study will help monitor the progress of companies in providing better information to consumers.

We believe that these measures will help provide thorough, clear, and more accurate billing information to all telecommunications customers, individuals as well as institutions.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Mary M. Gross", with a stylized flourish at the end.

Mary M. Gross, for the American Federation
of Teachers

This filing regarding FCC Docket No. 98-170 was sent to FCC Commissioners:

William Kennard, Chairman
1919 M Street, N. W.
Washington, D. C. 20554

Commissioner Susan Ness
1919 M Street, N. W.
Washington, D. C. 20554

Commissioner Michael Powell
1919 M Street, N. W.
Washington, D. C. 20554

Commissioner Gloria Tristani
1919 M Street, N. W.
Washington, D. C. 20554

Commissioner Harold Furchtgott-Roth
1919 M Street, N. W.
Washington, D. C. 20554